UNITED STATES DISTRICT COURT SOURTHERN DISTRICT OF OHIO

C': 1008 -1 EII 6: ng

HOWARD KERSTINE,

CIVIL ACTION NO. C-1-02-080

Plaintiff.

v.

NINE WEST GROUP INC., et al.,

November 1, 2004

Defendants.

MOTION PURSUANT TO RULE 83.4(c) OF THE LOCAL RULES OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO FOR ADMISSION OF PETER R. BULMER PRO HAC VICE

Gary L. Greenberg ("Movant"), a member in good standing of the Bar of the State of Ohio, an attorney admitted to practice before the United States District Court for the Southern District of Ohio, and a member of Denlinger, Rosenthal & Greenberg, hereby moves the Court to enter an order permitting Peter R. Bulmer, a member of the law firm Jackson Lewis LLP, to practice <u>pro hac vice</u> before the United States District Court for the Southern District of Ohio to represent Nine West Group Inc. and Jones Apparel Group (collectively "Defendants"), pursuant to Rule 83.4(c) of the Local Rules of Civil Practice and Procedure of the United States District Court for the Southern District of Ohio ("Local Rule 83.4"). In support of the Motion, Movant states as follows:

Mr. Bulmer is a member in good standing of the Bar of the State of
Illinois. He is admitted to practice before: the United States
District Courts for the Northern District of Illinois, the Central
District of Illinois, the Northern District of Indiana, the District of

Colorado, the Eastern District of Michigan, the Western District of Michigan, the Eastern District of Wisconsin, the Western District of Wisconsin; the United States Courts of Appeal for the Sixth, Seventh, and Eighth Circuits; and the United States Supreme Court. There are no disciplinary proceedings pending against him.

- 2. Attached hereto as Exhibit A is a letter of good standing from the Attorney Registration And Disciplinary Commission of the State of Illinois regarding Peter R. Bulmer, pursuant to Local Rule 83.4.
- 3. Movant requests that this Court allow this Motion so that Mr. Bulmer may file pleadings and appear and be heard at hearings and trial in the adversarial proceedings of this case.
- 4. Notice of this Motion has been provided to the attorneys for the Plaintiff, Howard Kerstine. In light of the nature of the relief requested, Movant submits that no other or further notice need be given.
- 5. No previous request for the specific relief sought herein has been made to this or any other Court.

WHEREFORE, Movant respectfully requests the Court enter an Order permitting Peter R. Bulmer to appear pro hac vice in association with the Movant as counsel to the Defendants in the adversarial proceedings of this case and granting such other relief as is just.

Dated: November 1, 2004 Cincinnati, Ohio

> Respectfully submitted, **DEFENDANTS** NINE WEST GROUP INC. and JONES APPAREL GROUP

By: s/ Gary L. Greenberg Gary L. Greenberg (0023180) DENLINGER, ROSENTHAL & GREENBERG CO., L.P.A. 425 Walnut Street **Suite 2310** Cincinnati, Ohio 45202 (513) 621-3440 (Telephone) (513) 621-4449 (Facsimile)

Trial Attorney for Defendants

CERTIFICATION OF SERVICE

I hereby certify that on this 1st day of November, 2004, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

s/ Gary	L. Greenberg	



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION of the SUPREME COURT OF ILLINOIS

One Prudential Plaza 130 East Randolph Drive Chicago, IL 60601-6219 (312) 565-2600 (800) 826-8625 Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333 Springfield, IL 62701 (217) 522-6838 (800) 252-8048 Fax (217) 522-2417

Peter R. Bulmer Jackson, Lewis, LLP 320 West Ohio Street - Suite 500 Chicago, IL 60610

> Chicago Thursday, October 28, 2004

In re: Peter Rocco Bulmer Admitted: 11/6/1986 Attorney No. 6192960

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours, Mary Robinson

Administrator

Darryl R. Evans

Deputy Registrar

DRE



Mon Nov 1 16:06:23 2004

UNITED STATES DISTRICT COURT

CINCINNATI, OH

Receipt No. 100 424638 Cashier sjl

Tender Type CHECK

Check Number: 13714

Transaction Type

00 Code Div No Acct 4661 1 6855XX

Amount \$ 50.00

BARY L GREENBERG

PRO HAC VICE 1:02-CV080

Mon Nov 1 16:06:23 2004

Check No. 13714
Amount\$ 50.00
Pay any Federal Reserve Bank or
General Depository for credit to
United States Treasury Symbol 4661